

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAKEFRONT PICTURES, LLC, JENNIFER KARUM and THE CURSE, LLC,)	
)	
Plaintiffs,)	Case No. 1:24-cv-01108
)	
vs.)	Hon. Judge Jeffrey I Cummings
)	
JORDAN ANCEL, JORDAN ANCEL INTERNATIONAL, LLC, ROCK CITY ROAD FILMS LLC, CANDICE ROSE, and DOE)	Hon. Mag. Judge M. David Weisman
DEFENDANTS 1-20,)	
)	
Defendants.)	

JOINT INITIAL STATUS REPORT

Plaintiffs, LAKEFRONT PICTURES, LLC, JENNIFER KARUM and THE CURSE, LLC (collectively, the “Plaintiffs”), and Defendants JORDAN ANCEL, JORDAN ANCEL INTERNATIONAL, LLC, ROCK CITY ROAD FILMS LLC, CANDICE ROSE (collectively, the “Defendants”), by their respective attorneys, submit this Joint Initial Status Report:

I. Nature of the Case

A. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1) because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States.

B. The Complaint (Dkt. # 1), filed on February 8, 2024, asserts claims for Defamation (Count I), False Light Invasion of Privacy (Count II), Breach of Contracts (Counts III, V, X), Rescission of Contract (Count IV), Tortious Interference (Count VI), Intentional Infliction of Emotional Distress (Count VII), and Civil Conspiracies (VIII, IX).

C. The Complaint seeks compensatory and punitive damages, as well as contract rescission.

D. The Civil Coversheet (Dkt. # 2) reflects Plaintiffs request for a trial by jury.

E. All specifically named parties have been served.

II. Discovery and Pending Motion

A. On April 11, 2024, Defendants filed a Motion to Stay or Dismiss the Complaint (Dkt. # 7) based upon the *Colorado River* abstention doctrine, and F.R.C.P. 12 (b)(1) and 12(b)(6). No briefing schedule has been set on the Motion. The parties propose that Plaintiffs be permitted to respond in opposition to the Motion on or before May 16, 2024, and that Defendants be given to and including June 6, 2024 to reply in support of the Motion.

B. The parties shall present, as necessary, a comprehensive discovery plan within fourteen (14) days from the disposition of the Motion.

III. Settlement and Referrals

A. To date, there have been no meaningful settlement discussions.

B. Plaintiffs and Defendants believe that a settlement conference at an early stage would be appropriate.

C. The Parties have been informed about the possibility of proceeding before Magistrate Weisman. No decisions have been made to date as to the scope of a requested referral.

RESPECTFULLY SUBMITTED,

**LAKEFRONT PICTURES, LLC,
JENNIFER KARUM and THE CURSE,
LLC,**

By: /s/ George J. Spathis
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RESPECTFULLY SUBMITTED,

**JORDAN ANCEL, JORDAN
ANCEL INTERNATIONAL, LLC,
ROCK CITY ROAD FILMS LLC
and CANDICE ROSE**

By: /s/ Alexander N. Loftus
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CERTIFICATE OF SERVICE

I, George J. Spathis, an attorney, hereby certify that on April 16, 2024, I caused a true and correct copy of the foregoing document to be filed with the Clerk of the Court using the CM/ECF filing system and served upon the parties listed below via electronic mail.

Attorneys for Plaintiff:

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/s/ George J. Spathis